UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	Case No. 3:22-cr-00175
v.)	Judge Trauger
)	
STEPHEN FLOYD, II)	

UNOPPOSED FINAL MOTION OF DEFENDANT STEPHEN FLOYD TO ENLARGE TIME WITHIN WHICH TO FILE PRETRIAL MOTIONS

(Information Related to the 2/14/21 THP Traffic Stop of Mr. Floyd's Vehicle)

COMES NOW the Defendant, **Stephen Floyd**, by and through his undersigned counsel, and hereby moves the Court for the entry of an order enlarging the time within which to file pretrial motions from Tuesday, June 20, 2023, to, and including, Friday, June 23, 2023. In support hereof, Defendant states as follows:

- 1. On Monday afternoon, June 12, 2023, undersigned counsel received a replacement flash drive from the United States which contains three videos relating to a traffic stop of the Defendant.
- 2. The motion to suppress and supporting memorandum of law are substantially complete. Undersigned counsel needs additional time to review the videos and the draft motion to suppress with Mr. Floyd and co-counsel, who lives and works in Chattanooga, Tennessee.
- 3. Assistant United States Attorney Robert E. McGuire has authorized undersigned counsel to report that the government does not oppose this motion.

WHEREFORE, based on the foregoing, Defendant Floyd respectfully requests that this Honorable Court enter an order enlarging the time within which to file pretrial motions from Tuesday, June 20 2023, to and including, Friday, June 23, 2023.

Respectfully submitted,

TUNE, ENTREKIN & WHITE, P.C. Capitol View 500 11th Avenue North, Suite 600 Nashville, TN 37203 (615) 244-2770 pstrianse@tewlawfirm.com

BY: s/Peter J. Strianse
PETER J. STRIANSE
Attorney for Defendant Floyd

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent via the Court's electronic filing system, if registered, or, if unregistered in the Court's system, it has been sent via facsimile and deposited in the United States Mail, postage prepaid, to:

Robert E. McGuire Assistant United States Attorney Middle District of Tennessee 719 Church Street, Suite 3300 Nashville, TN 37203

This 20th day of June, 2023

S/Peter J. Strianse
PETER J. STRIANSE